

EXHIBIT B

The Mungo Law Firm, PLLC

333. W. Fort St.
Suite 1500
Detroit, MI 48226

Attorneys and Counselors
LEONARD MUNGO

Telephone: (313) 963-0407
Fax: (313) 963-0200
E-mail: mungol16@msn.com

October 23, 2019

Ronald G. Acho, Esq.
Elizabeth Rae-O'Donnell, Esq.
James R. Acho, Esq.
Cummings, McClorey, Davis, & Acho, PLC
17436 College Parkway
Livonia, MI 48152

Ethan Vinson, Esq.
City of Warren, City Attorney
1 City Square, Suite 400
Warren, MI 48093-5390

Re: Desheila Howlett v. City of Warren, *et al.*

Counselors:

Enclosed please find Plaintiff Desheila C. Howlett's Supplements To Defendants' First Set Of Interrogatories And Requests For Production Of Documents, bates labeled 0117 and 0118 in the above-referenced matter.

Should you have any questions regarding the above, please do not hesitate to contact me.

Sincerely,



Leonard Mungo

LM/dmw
Enclosure

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DESHEILA C. HOWLETT,

Plaintiff,

v.

CIVIL NO. 17-11260
Hon. Terence G. Berg
Mag. R. Steven Whalen

CITY OF WARREN; COMMISSIONER
JERE GREEN, acting in his individual
capacity; LT. LAWRENCE GARDNER;
SHAWN JOHNSON; DAWN MCLANE;
ANWAR KHAN; DARRIN LABIN;
WILLIAM ROSS; KEVIN BARNHILL;
PAUL HOUTOS; SCOTT TAYLOR

Defendants.

Leonard Mungo
Mungo & Mungo Law At Law
Attorneys for Plaintiff
333 W. Fort St.
Suite 1500
Detroit, MI 48226
(313) 963-0407
(313) 963-0200 (fax)

Ronald G. Acho (P23913)
Elizabeth Rae-O'Donnell (P41529)
James R. Acho (P62175)
Cummings, McClorey, Davis, & Acho, PLC
Attorneys for Defendants
17436 College Parkway
Livonia, MI 48152
(734) 261-2400 / (734) 261-2400 (Fax)

Ethan Vinson (P26608)
City of Warren, City Attorney
Co-Counsel for Defendants
1 City Square, Suite 400
Warren, MI 48093-5390
(586) 574-4671 / (586) 574-4530 (Fax)

PLAINTIFF DESHEILA C. HOWLETT'S
SUPPLEMENTS TO DEFENDANTS' FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS

Plaintiff DeSheila C. Howlett ("Plaintiff"), by and through her attorney, Mungo & Mungo At Law, PLLC, hereby provides the attached documents as supplements to defendants' first set of interrogatories and requests for production of documents, numbers 52-59, pursuant to Fed. Civ. P. 26(e) in the above-captioned matter as follows:

DOCUMENTS;

In addition to the documents already identified and produced by Plaintiff Desheila C. Howlett pursuant to Defendants' First Set Of Interrogatories And Requests For Production Of Documents, Plaintiff hereby supplements its response to said request numbers 52-59 with the attached documents identified as: *Inter-Department Communication (Bates labeled 0117 and 0118)*. Plaintiff may use the additional documents attached hereto in support of her claims or defenses, unless used solely for impeachment.

Respectfully submitted,

By: /s/ Leonard Mungo
Leonard Mungo (P43562)
The Mungo Law Firm, PLC
333 W. Fort Street, Suite 1500
Detroit, MI 48226
(313) 963-0407

Dated: October 23, 2019

INTER-DEPARTMENT COMMUNICATION

Warren Police

June 12, 2013

To : Captain Matheney #728
From : Sergeant Gill #525
Subject : Officer Khan #072

This form #50 is to bring your attention to Officer Khan's behavior and verbal comments since the May 4, 2013 promotional test for corporal. As I mentioned to you before, Khan failed to meet his high expectations, did not pass the test, and even with the combined oral board score, did not place on the promotional list. I called and spoke with Khan on May 6, 7, 9, and 20 where he repeatedly expressed that he let down his father because he assured him that he would get promoted, was embarrassed to face his coworkers, and was deeply depressed about the whole situation. During one of Khan's emotional rants he yelled a racial slur by saying, "that nigger Officer Howlett # 155 made the list and I didn't."

Khan took several unscheduled days off by using sick days and single furlough days shortly after the flunked test. Khan took 10 days off in an 11 day span between May 10 and May 20.

Khan's work performance has suffered with an increase in citizen complaints that have been remedied informally. While reviewing Khan's scout car tapes there is a significantly adverse change in his attitude towards citizens. Khan is noticeably less patient and short when speaking with citizens. Khan's radio etiquette with dispatch is harsher and his demeanor towards other officers has changed. Officers Morin #144 and Davis #185 have mentioned that Khan makes negative comments towards them for their proactive police work. Their proactive work requires Khan to handle more calls for service.

I believe that Khan could benefit from intervention by the department's administration in the form of professional counseling.

Respectfully submitted,

Sergeant Art Gill

WPD Form 50

INTER-DEPARTMENT COMMUNICATION Warren Police

December 24, 2013

To : Lieutenant Wilke #649
From : Sergeant Gill #525
Subject : Officer Khan #072

Officers Howlett #155, Vandellinder #040, and Khan #072 were assigned to the detention center on 12-24-13. Officer Howlett notified me at the end of her shift that Officer Khan was missing from the floor while neglecting his duties and was last seen getting onto the elevator. Howlett added that Khan has been missing for about half of the shift.

I checked the elevators on ExacqVision and observed that Khan had entered the elevator at least three times that had spanned several hours.

This obviously poses a safety risk to the officers assigned to the jail when an officer abandons their assigned post.

Respectfully submitted,

Sergeant Art Gill

WPD Form 50

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Plaintiff,

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CIVIL NO. 17-11260
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CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2019, I Served Plaintiff Desheila C. Howlett's Supplements To Defendants' First Set Of Interrogatories And Requests For Production Of Documents and all attachments and/or exhibits with the all counsel of record via First Class Mail and Electronic Mail at their respective addresses.

By: /s/ Leonard Mungo
Leonard Mungo (P43562)
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333 W. Fort Street, Suite 1500
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Dated: October 23, 2019